

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**SHANNON EASTER**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO.:** 20-187

**JACKSON STATE UNIVERSITY**

**DEFENDANT**

**JURY TRIAL DEMANDED**

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**COMPLAINT**

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This is an action to recover actual and punitive damages for discrimination in violation of the Title VII of the Civil Rights Act of 1964 and sex discrimination. The following facts support the action:

1.

Plaintiff, Shannon Easter, is an adult resident citizen of Madison County, Mississippi who may be contacted through undersigned Counsel.

2.

Defendant, Jackson State University is a Mississippi University organized under the laws of the State of Mississippi who may be served with process through the Attorney General at 550 High Street, Jackson Mississippi 39201.

3.

This court has concurrent jurisdiction under 28 U.S.C. § 1331 and civil rights jurisdiction under 28 § 1343, for a cause of action arising under the Title VII of the Civil Rights Act of 1964,

as amended by the Civil Rights Act of 1991. Venue is proper, because Defendant's employed in Plaintiff in Jackson, Mississippi.

4.

Plaintiff has filed an EEOC charge attached hereto as Exhibit "A" and has received a Right-to-Sue letter attached hereto as Exhibit "B".

5.

Plaintiff was employed by the Defendant and did an excellent job.

6.

While working for the Defendant, Plaintiff first complained about being sexually harassed in October of 2014 by a male co-worker, Doug Stringfellow. Plaintiff complained to human resources and her department head, but the situation never changed.

7.

In March/April of 2018 Plaintiff began to complain again about being sexually harassed because her harasser was moved into an office right next to her and the harassment got worse. Plaintiff told human resources and her supervisor that Plaintiff wanted to speak to the EEOC office on campus, and shortly thereafter she was terminated, even though Plaintiff had an excellent work evaluation history. The only reason for Plaintiff's termination was her complaints of sexual harassment.

8.

Plaintiff reached out to human resources in hopes that her job could be saved, and the harassment ended, but the Defendant simply brushed the issues aside and retaliated against the Plaintiff.

9.

The actions and omissions of the Defendant, as complained of herein, created and fostered a hostile work environment because of Plaintiff's sex in violation of Title VII. In addition, Defendants have conspired to deprive Plaintiff of her rights and employment, inflicting emotional distress upon Plaintiff, because Plaintiff is a woman, in violation of 42 U.S.C. § 1981 and the 14<sup>th</sup> Amendment.

10.

The acts and omissions of the Defendant was in violation of Title VII. Plaintiff lost her employment because the Defendant took no action on any complaints related to the male coworker. Plaintiff was discharged for complaining about sexual harassment.

11.

Plaintiff is entitled to actual damages for mental anxiety and stress and lost income. Defendant's actions are outrageous such that punitive damages are due. Plaintiff seeks damages for lost income, and mental stress and anxiety against the Defendants for:

A. Sex discrimination and Sexual harassment under Title VII and 42 U.S.C. 1981

#### **PRAYER FOR RELIEF**

Plaintiff prays for actual, compensatory, special, and punitive damages in the amount to be determined by a jury, reinstatement and for reasonable attorney's fees.

THIS the 11 day of March, 2020.

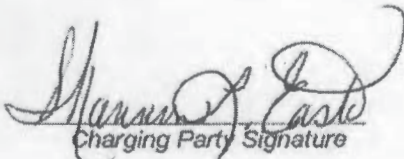
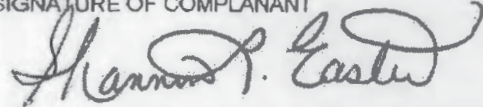
Respectfully submitted,

**SHANNON EASTER,  
PLAINTIFF**

  
DANIEL M. WAIDE, MSB #103543

Daniel M Waide, MS Bar #103543  
Johnson, Ratliff & Waide, PLLC  
1300 Hardy Street  
Hattiesburg, MS 39401  
T: (601) 582-4553  
F: (601) 582-4556  
[dwaide@jhrlaw.net](mailto:dwaide@jhrlaw.net)

EEOC Form 6 (3/01)

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented to: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
_____ and EEOC State or local Agency, if any			
Name (indicate Mr. Ms. Mrs.) <b>Shannon Easter</b>		Home Phone (Incl. Area Code) 662-607-1631	
Date of Birth <del>XXXXXXXXXX</del>			
Street Address City, State and ZIP Code <b>711 Lake Harbour Drive, Ridgeland, MS 39157</b>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>Jackson State University</b>		No. Employees, Members 15 +	
Phone No. (Include Area Code) 601-979-2121			
Street Address City, State and ZIP Code <b>1400 John R. Lynch Street, Jackson, MS 39217</b>			
Name _____		No. Employees, Members _____	
Phone No. (Include Area Code) _____			
Street Address City, State and ZIP Code _____			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below.)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest October 2014 – August 2018 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)): I want the EEOC to investigate my claims of gender discrimination under Title VII. I was terminated, at least in part, because I complained about being sexually harassed by a male co-worker. I first complained about being sexually harassed in October of 2014 by a male co-worker, Doug Stringfellow. I complained to human resources and my department head. Things never really changed. In March/April of 2018 I began to complain again about being sexually harassed because my harasser was moved into an office right next to me and the harassment got worse. I told human resources and my supervisor that I wanted to speak to the EEOC office on campus, and shortly thereafter I was terminated, even though I had an impeccable work evaluation history. The only possible reason for my termination was my complaints of sexual harassment.			
I would like the EEOC to investigate my charges because my termination was based in part on my gender and my complaints of sexual harassment.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.  <div style="text-align: center;">           _____          Date Charging Party Signature       </div>		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <div style="text-align: center;">           _____          SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE          (month, day, year)       </div>	

EXHIBIT

A



U.S. Department of Justice  
Civil Rights Division

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

CERTIFIED MAIL

7018 1830 0000 1244 7686

950 Pennsylvania Avenue, N.W.

Karen Ferguson, EMP, PHB, Room 4701

Washington, DC 20530

December 18, 2019

Ms. Shannon L. Easter  
c/o Daniel M. Waide, Esquire  
Attorney at Law  
Great Southern National Bank  
1300 Hardy Street, 2nd Floor  
Hattiesburg, MS 39401

Re: EEOC Charge Against Jackson State University  
No. 423201802508

Dear Ms. Easter:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

The investigative file pertaining to your case is located in the EEOC Jackson Area Office, Jackson, MS.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Eric S. Dreiband  
Assistant Attorney General  
Civil Rights Division

by

*Karen L. Ferguson*  
Karen L. Ferguson

Supervisory Civil Rights Analyst  
Employment Litigation Section

cc: Jackson Area Office, EEOC  
Jackson State University

EXHIBIT

B

## Case Number if filed prior to 1/1/94

Elections  
Habeas Corpus  
Post Conviction Relief  
Prisoner  
Other \_\_\_\_\_

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT

SHANNON EASTER

PLAINTIFF

V.

CIVIL ACTION NO.: 20-127

JACKSON STATE UNIVERSITY

DEFENDANT

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SUMMONS

THE STATE OF MISSISSIPPI  
COUNTY OF HINDS

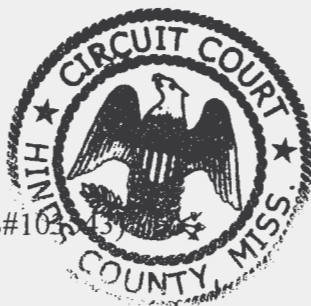
TO: Jackson State University  
c/o Attorney General  
550 High Street  
Jackson, MS 39201

THE COMPLAINT, WHICH IS ATTACHED TO THIS SUMMONS, IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to Daniel M. Waide, P.O. Box 17738, Hattiesburg, MS 39404, attorney for the Plaintiffs. Your response to the Complaint must be mailed or delivered within 30 days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 20 day of March, 2020.

Zack Wallace,  
HINDS COUNTY CIRCUIT CLERK



By: Rona Dally D.C.

Daniel M. Waide, (MSB#10343)  
1300 HARDY ST.  
PO BOX 17738  
HATTIESBURG, MS 39404  
601-582-4553 (OFFICE)  
601-582-4556 (FAX)  
dwaide@jhrlaw.net